

# Authorization Basis Amendment Request

ABAR Title: Authorization Basis Maintenance – Proceed-at-RiskABAR #: ABAR-W375-00-00006 Revision: 0 Associated ABCN #: ABCN-W375-00-00005Originator: Thomas R. McDonnell Date: 26 Feb 2000  
Print NameDescription of proposed revision:

Revises the Integrated Safety Management Plan (ISMP) to allow BNFL Inc. to implement facility changes (both to the design and administrative controls) at BNFL's risk during the design and construction phases (i.e., prior to Cold Testing) pending revision of the Authorization Basis, including Regulatory Unit approval of Authorization Basis Amendment Requests (ABARs), when required.

This proposed change will be part of a BNFL Inc. submittal to the RU that will include the following:

- a proposal that presents a new set of processes and procedures for the RPP-WTP Authorization Basis (AB) Maintenance Program
- suggested changes to RL/REG-97-13
- this ABAR.

This proposed change does not apply to changes to the approved Quality Assurance Program (QAP) or the approved Radiation Protection Program (RPP).

Reason(s) for the proposed revision:

The request to allow BNFL Inc. to proceed at risk with certain changes is prompted by BNFL's experience with situations in which project work has been impacted because desirable, safe and effective standards or practices were inconsistent with those described in the current Authorization Basis. It is likely that design and construction delays will occur in the future, potentially leading to serious cost and schedule consequences as a result of idling work forces while safety documentation is being developed and while Regulatory Unit review is in progress. BNFL Inc. believes that it will be advisable, on occasion, to "proceed at risk" with certain changes that require modifications to the Authorization Basis.

The risk of an accident involving radiological, nuclear or process chemical hazards occurring during design or construction (prior to Cold Testing) is low, as discussed further in Attachment #1. Therefore, a carefully-managed AB Maintenance Program that controls temporary non-alignment of the AB with the design or administrative controls during the design and construction phases will not affect safety.

Description of the proposed implementation schedule:

Regulatory Unit approval: April 1, 2000.

Change implemented by April 24, 2000.

If the revision involves the deletion or modification of a standard previously identified in the approved SRD, provide:

- A. An evaluation that demonstrates the revised SRD continues to identify a set of standards that will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards; and
- B. A certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

Attachments:

1. Copies of the AB document(s) or appropriate excerpt showing the proposed revision(s).
2. Copy of safety evaluation.
3. If not included above, justification for the revision and demonstration that the revision is safe.
4. Items A and B above, if applicable.

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ABAR #: ABAR-W375-00-00006 Revision: 0 Associated ABCN #: ABCN-W375-00-00005

Originator: Thomas R. McDonnell Date: 26 Feb 2000  
Print Name

Manager, Engineering

Date

Radiation Safety and Regulatory Manager

Date

Manager, Quality Assurance

Date

Chairman, Project Safety Committee

Date

RPP-WTP General Manager

Date